

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

TERA A. McMILLIAN,)	
)	
Plaintiff,)	
)	
v.)	CASE NO.: 2:07:cv-001-WKW
)	
ALABAMA DEPARTMENT OF)	
YOUTH SERVICES, <i>et. al.</i> ,)	
)	
Defendants.)	

DEFENDANT ALABAMA DEPARTMENT OF YOUTH SERVICES'
REQUESTED VOIR DIRE

1. Has any member of the jury ever been represented by any of the following attorneys:
 - a. T. Dudley Perry, Jr.
 - b. Sancha E. Teele
 - c. Jimmy Jacobs
 - d. James Eldon Wilson
 - e. Gwendolyn Thompson- Kennedy
 - f. Theron Stokes
2. Is any member of the jury personally acquainted or related to any of the above-named attorneys? If so, please explain your relationship.
3. Does any member of the jury feel that as a result of your relationship with the attorneys named above it would influence your decision or make your decision more difficult in this lawsuit?
4. Is any member of the jury related to or does any member of the jury personally know anyone who works for the Alabama Department of Youth Services?
5. Is any member of the jury related to or does any member of the jury personally know Tera McMillan?
6. Have you or any member of your family ever felt they were a victim of sexual harassment at the workplace? If yes, please describe.
7. Have you or any member of your family ever felt you have been subject to discrimination

of any kind at the workplace? If yes, please describe and note if any actions were taken.

8. Have you or any member of your family been the subject of a sexual harassment complaint at the workplace? If yes, please describe. If yes, what was the result/outcome of the allegation?
9. Have you or any member of your family been subject to discipline at the workplace? If yes, please explain.
10. Do you believe that an employer should necessarily be liable for the actions of its employees?
11. If the facts show that the State of Alabama Department of Youth Services was not at fault, will you hesitate to find in favor of the State?
12. Do you believe that it is reasonable for a victim of sexual harassment to delay reporting such harassment to an employer? If yes, please explain. If no, please explain.
13. If the facts show that the Plaintiff unreasonably failed to report the alleged harassment to her employer, will you hesitate to find in favor of the State of Alabama?
14. Do you believe that an employer should be liable for sexual harassment if the facts show that the victim of sexual harassment unreasonably delayed reporting such harassment? If yes, please explain. If no, please explain.
15. Do you believe that an employer should be held liable for damages for personal conflicts between a plaintiff and a plaintiff's co-workers? If yes, please explain. If no, please explain.
16. If the facts show that the State of Alabama was not at fault regarding the alleged conflicts between the plaintiff and her co-workers, will you hesitate to find in favor of the State of Alabama?

Respectfully submitted this 14th day of July, 2008.

s/ T. Dudley Perry Jr.

T. Dudley Perry, Jr.

Bar Number: 3985-R67T

General Counsel

Attorney for the Defendant

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s/Sancha E. Teele

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CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of July, 2008, I electronically filed the foregoing,

DEFENDANT ALABAMA DEPARTMENT OF YOUTH SERVICES' REQUESTED

VOIR DIRE with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Jimmy Jacobs
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s/ T. Dudley Perry Jr.

T. Dudley Perry, Jr.